

IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

BERNARD MIMS,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 18-cv-7192
	)	
THE CITY OF CHICAGO, KENNETH	)	Judge Steven Seeger
BOUDREAU, RICHARD PECK, ROBERT	)	Magistrate Judge Jeffrey Cole
MONTGOMERY, DANIEL MCNALLY,	)	
TED PRZEPIORA, MICHAEL MCDERMOTT,	)	
RAYMOND KAMINSKI, JEAN ROMIC, and	)	
JOHN CLISHAM,	)	
	)	
Defendants.	)	

**AMENDED JOINT PROPOSED SCHEDULING ORDER**

Now Comes Plaintiff, BERNARD MIMS, by and through his undersigned counsel, and THE CITY OF CHICAGO, KENNETH BOUDREAU, RICHARD PECK, ROBERT MONTGOMERY, DANIEL MCNALLY, TED PRZEPIORA, MICHAEL MCDERMOTT, JEAN ROMIC, and JOHN CLISHAM, by and through their undersigned counsel, and pursuant to the Court's September 8, 2021 Order [Dkt. 133] hereby submits the following proposed scheduling order:

1. The parties filed a Joint Proposed Scheduling Order on September 10, 2021. Dkt. 136. It has not yet been ruled upon. The Plaintiff's attorney who was handling this case and responsible for disclosure of expert reports, Julie Goodwin, ended her employment with Loevy & Loevy in mid-October 2021. *See* Dkts. 148, 149. The attorney from Loevy & Loevy who is now responsible for the day-to-day litigation of this case, including the disclosure of expert reports, is Elizabeth Wang, who entered an appearance on October 13, 2021. Given that Ms. Wang had previously had no involvement in this case, and the Court has not yet entered an expert discovery

schedule, the parties hereby submit an amended joint proposed scheduling order. The proposed date for expert disclosure closure remains the same as previously proposed.

2. **Expert Discovery.** No schedule for expert discovery has previously been set in this matter. The parties propose the following expert discovery schedule:

- a. Plaintiff is to disclose Rule 26(a)(2) Expert Reports by December 17, 2021.
- b. Defendants to depose Plaintiff's expert(s) by February 28, 2022.
- c. Defendants to disclose their Rule 26(a)(2) Expert Reports by March 28, 2022.
- d. Plaintiff to depose Defendants' expert(s) by April 28, 2022.
- e. All expert discovery to conclude by April 28, 2022.

3. **Dispositive Motion Schedule.** No schedule for dispositive motions has previously been set in this matter. The parties propose that any dispositive motion be filed no later than May 13, 2022. The parties will meet & confer no later than April 28, 2022 before filing any dispositive motion.

Respectfully Submitted,

/s/ Elizabeth Wang  
*One of Plaintiff's Attorneys*

Elizabeth Wang  
Loevy & Loevy  
2060 Broadway, Ste. 460  
Boulder, CO 80302  
(720) 328-5642

Jon Loevy  
Loevy & Loevy  
311 N. Aberdeen, 3rd Floor  
Chicago, Illinois 60607  
(312) 243-5900

Jennifer Blagg  
Blagg Law  
1333 W. Devon Ave., Suite 267  
Chicago, Illinois 60660  
(773) 859-0081

CELIA MEZA UTRERAS  
Corporation Counsel of the City of Chicago

/s/ Lisa M. Meador  
*Attorney for Defendant City of Chicago*

James G. Sotos  
Jeffrey N. Given  
Lisa M. Meador  
Sara J. Schroeder  
The Sotos Law Firm, P.C.  
141 W. Jackson Blvd., Ste. 1240A  
(630) 735-3300

/s/ Stacy A. Benjamin  
*One of the Defendant Officers' Attorneys*

Special Assistant Corporation Counsel  
Eileen E. Rosen  
Stacy A. Benjamin  
Theresa B. Carney  
Brittany D. Johnson  
Rock Fusco & Connelly, LLC  
321 N. Clark Street, Ste. 2200  
Chicago, Illinois 60654  
(312) 494-1000

**CERTIFICATE OF SERVICE**

I, Elizabeth Wang, an attorney, hereby certify that I served the foregoing Amended Joint Proposed Scheduling Order on all parties of record via the Court's CM / ECF filing system on November 1, 2021.

/s/ Elizabeth Wang